

REMARKS/ARGUMENTS

In the Office Action, the Examiner 1) rejected claims 1, 3, 4, 8, and 11 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 6,305,476, issued to *Knight*, in view of U.S. Patent 5,224,389, issued to *Jensen et al.*, U.S. Patent 3,835,929, issued to *Suman, Jr.*, and the Applicant's Disclosure; and 2) rejected claims 12, 14, and 15 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 6,305,476, issued to *Knight*, in view of U.S. Patent 5,224,389, issued to *Jensen et al.* and U.S. Patent 3,835,929, issued to *Suman, Jr.* The Applicant amends the claims and responds as follows.

Rejections under 35 U.S.C. § 103(a)

The Examiner rejected claims 1, 3, 4, 8, and 11 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 6,305,476, issued to *Knight* (hereinafter *Knight*), in view of U.S. Patent 5,224,389, issued to *Jensen et al.* (hereinafter *Jensen*), U.S. Patent 3,835,929, issued to *Suman, Jr.* (hereinafter *Suman*), and the Applicant's Disclosure. The Examiner also rejected claims 12, 14, and 15 under 35 U.S.C. § 103(a) as being unpatentable over *Knight* in view of *Jensen* and *Suman*.

In the interest of placing the current application in condition for allowance and without comment on the patentability of the previously pending claims over the cited art, claims 1 and 12 have been amended to further distinguish the pending claims over the cited art. Claim 1 has been amended to include each of the mechanical suspension means, flexible tubular conduit, and electrical cable being spooled onto individual reels and being installed into the well at the same rate. Claim 12 has been amended to include each of the suspension cable, the production tubing, and the electrical cable being stored on separate reels.

The claims as amended are clearly differentiated over *Knight*, which discloses a cable-supported flexible hose but does not disclose a submersible electric pump or the separate components of being stored on individual reels. The other art cited by the Examiner, including *Suman* and *Jensen*, disclose submersible pumping systems but do not disclose having the individual components of these systems extending from individual reels. Thus, the Examiner has not cited any art that describes a system where each of the three components of a cable-supported submersible pumping system are stored on individual reels. Therefore, claims 1 and 12, as well as their dependent claims, should be allowed.

New Claims

Claims 16-23 have been added to further claim the current invention. Claim 16 is dependent from claim 12 and should be allowed for the reasons discussed above relative to claim 12. Claims 17-23 claim a submersible pumping system having each component extending from a separate reel and should also be allowable over the cited art.

Conclusion

In the course of the foregoing discussions, Applicants may have at times referred to claim limitations in shorthand fashion, or may have focused on a particular claim element. This discussion should not be interpreted to mean that the other limitations can be ignored or dismissed. The claims must be viewed as a whole, and each limitation of the claims must be considered when determining the patentability of the claims. Moreover, it should be understood that there may be other distinctions between the claims and the cited art which have yet to be raised, but which may be raised in the future. Applicants respectfully request reconsideration and allowance of the pending claims.

It is the Applicant's desire that this case be brought to a swift resolution, therefore, if the Examiner feels that a telephone conference would expedite the resolution of this case, he is respectfully requested to contact the undersigned. Applicants respectfully request that a timely Notice of Allowance be issued in this case.

Respectfully submitted,



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